

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

SAFYA ROE YASSIN,

Defendant.

Case No. 16-3024-01-CR-S-MDH

UNITED STATES' MOTION FOR EXTENSION TO FILE

The United States of America, by and through undersigned counsel, respectfully requests a 14-day extension of time in which to file a pleading pursuant to § 4 of the Classified Information Protection Act (CIPA). Per order of the Court, any CIPA § 4 pleading by the United States is currently due July 11, 2016. The United States respectfully requests a 14-day extension of time up to and including July 25, 2016, in which to file a pleading pursuant to CIPA § 4.

The United States offers the following suggestions in support of this motion:

SUGGESTIONS IN SUPPORT

On February 23, 2016, the Defendant was indicted for transmitting a threatening communication in violation of Title 18, United States Code Section 875(c). (Crim. D.E. 18.) On said date, the Defendant was arraigned on the single count indictment and a detention hearing was held. At the conclusion of the detention hearing the Magistrate Court found by clear and convincing evidence that the defendant is a danger to the community and issued a final

Order of Detention on February 26, 2016. (Crim. D.E. 25.) The defendant remains detained pending trial.

On March 7, 2016, the Government filed a motion for a Pre-trial Conference pursuant to the Classified Information Procedures Act (CIPA) in an effort to inform the Court and the defendant about classified material that was collected as part of the underlying investigation and how classified information will be the subject of certain statutory procedures pursuant to CIPA, as well as other applicable rules, statutes, and/or case law. (Crim. D.E. 28.)

On April 29, 2016, this Court held a hearing pursuant to CIPA § 2, during which the date by which the United States could provide the Court a filing pursuant to CIPA § 4 was discussed. Counsel for the United States stated that July 11, 2016, was sufficient time to prepare any such filing, and on May 12, 2016, the Court ordered the United States' CIPA § 4 filing was due by July 11, 2016. (Crim. D.E. 60.)

The United States' filing pursuant to CIPA § 4 requires consultation and consent with several components of the Executive Branch. The Executive Branch requires additional time to consult with various agencies involved in making the necessary representations to make an adequate CIPA § 4 filing in this case.

This is the first request for an extension of this deadline, and the undersigned believes that an additional 14 days will be sufficient to complete the consultation and receive the necessary approvals. For that reason, an extension of 14-days up to and including July 25, 2016 is requested.

WHEREFORE, the United States respectfully requests a 14-day extension of time up to and including July 25, 2016, in which to file a pleading pursuant to CIPA § 4.

Respectfully submitted,

By */s/ Abram McGull II*
Abram McGull II
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/s/ Brian Patrick Casey
Brian Patrick Casey
Assistant United States Attorney

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was electronically filed on July 6, 2016 with the Clerk of Court using the CM-ECF system of the United States District Court for the Western District of Missouri thereby sending notification of the filing to CM-ECF participants in this matter.

/s/ Abram McGull II
Abram McGull II
Assistant United States Attorney